

UNITED STATES DISTRICT COURT
for the
District of Oregon

CBT NUGGETS, L.L.C.,

Plaintiff(s)

Vs.

Case No.: 6:12-cv-00291-MC

Tri Nguyen, et al.

**DEFENDANT'S ANSWER TO FILE
MANAGEMENT ORDER**

Defendant(s)

Witnesses:

Lay Witnesses:

1. **Jim L Tatum:** time estimate 90 minutes, testify in person at trial
2. **Greg Tatum:** time estimate 90 minutes, testify over the phone
3. **Jennifer Wilkinson:** time estimate 90 minutes, testify in person at trial
4. **Edsel Garello:** time estimate 90 minutes, testify in person at trial
5. **Plaintiff's counsel E. Bradley Litchfield:** time estimate 90 minutes, testify in person at trial
6. **Plaintiff's counsel Samuel Roberts:** time estimate 90 minutes, testify in person at trial

Expert Witnesses: N/A

Witnesses with Disability: N/A

Itemized List of Special Damages:

- Emotional distress damages for \$150,000 that Defendant and family suffered since April 5, 2011 because of bully, intimidation, scare tactics by Plaintiff and his counsel.

Deposition Designation: Defendant will provide the Court the deposition transcripts of Jim L Tatum, Greg Tatum, and Jennifer Wilkinson separately through Impeachment Exhibits.

Trial Memoranda (not required): N/A

Proposed Voir Dire Questions:

1. Have you ever experienced with bullying before? If yes, please tell me about your experience?
2. Have you ever experienced with intimidation before? If yes, please tell me about your experience?
3. Have you ever experienced with entrapment before? If yes, please tell me about your experience?
4. Have you ever experienced with extortion before? If yes, please tell me about your experience?
5. Have you ever attended college? What was your highest educational degree?
6. Did you come to America from a different country? If yes, please tell me your native nationality.
7. Do you have any immigrant friends, who came to America from a different country? If yes, please tell me how many immigrant friends you have had and their native nationalities.
8. Have you ever watched the Disney Pixar's Monsters, Inc movie (release date October 2001)? If yes, please tell me how many times you have watched it?
9. Have you ever watched the Disney Pixar's Monsters University movie (release date June 2013)? If yes, please tell me how many times you have watched it?
10. Do you have any children? If yes, please tell me the age of your youngest child?
11. Can you think of anything in your own life that reminds you of this case? What and how?

Jury Instructions: Due to Defendant's lack of knowledge about law, Defendant would like to request the Court to select the most appropriate jury instructions for this case.

Verdict Forms: Defendant would like to request that the Court use Defendant's proposed Verdict form, attached.



Tin Nguyen
Defendant.